

EXHIBIT 462

Highly Confidential - Subject to Further Confidentiality Review

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL	:	
PRESCRIPTION	:	MDL No. 2804
OPIATE LITIGATION	:	
<hr/>		Case No.
		1:17-MD-2804
THIS DOCUMENT RELATES	:	
TO ALL CASES	:	Hon. Dan A. Polster

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Thursday, December 6, 2018

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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Videotaped deposition of JASON BRISCOE, held
at the offices of Cavitch, Familo & Durkin,
1300 East Ninth Street, Cleveland, Ohio, commencing at
9:05 a.m., on the above date, before Carol A. Kirk,
Registered Merit Reporter and Notary Public.

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<p style="text-align: right;">Page 62</p> <p>1 Q. All right. And what I'm trying to 2 get to, is that -- is that a different report 3 than the greater than six-week average report? 4 A. No. 5 Q. Is it a number of reports? Is 6 it -- other than the six-week average report? 7 MR. JOHNSON: That is the six-week 8 average report. 9 A. Yeah. Yes. 10 Q. So the green bar report and the 11 six-week average report are -- are one and the 12 same? 13 A. Yeah. And, again, I'm not 14 positive that that copy that they receive is 15 printed on green bar versus 8-1/2 by 11. I'm 16 not -- I'm not sure about that. 17 Q. All right. And I apologize, 18 you've already -- just keep walking through 19 this. 20 So the greater than six-week 21 average report comes to Ms. Strang. And what's 22 the first thing she does with that report? 23 A. Her team would review it to see if 24 there were anything that would jump off the page</p>	<p style="text-align: right;">Page 64</p> <p>1 product being delivered to the pharmacy for any 2 of the -- any of the different prescriptions -- 3 A. Yeah. 4 Q. -- so it was to create kind of a 5 glut in the system, correct? 6 A. Yep. And we see value in that. 7 If there's additional sets of eyes that are 8 paying attention to a purchase order, 9 unbeknownst to them or known to them, that we 10 are seeing and providing you this information 11 that you're ordering product greater than your 12 six-week average -- which might not be 13 actionable, which likely is not actionable -- 14 it's value to us that they see it at the store 15 and they would see it at the distribution 16 center. 17 Q. All right. And you're familiar 18 with the concept of just-in-time inventory, 19 right? Money's -- inventory sitting on the 20 shelves costs DDM money on its bottom line, 21 right? 22 A. Mm-hmm. 23 Q. So the less inventory sitting on 24 the shelf, the more money DDM makes, correct?</p>
<p style="text-align: right;">Page 63</p> <p>1 that they need -- would need to raise -- raise 2 their hand to somebody else. 3 Q. Okay. And is there a policy or 4 procedure in place that set the criteria for 5 what would cause Ms. Strang to perform due 6 diligence on any order that was greater than the 7 six-week average? 8 A. I don't believe so. That 9 particular report -- I didn't mean to -- 10 Q. No, that's okay. 11 A. -- rush the answer, but I don't 12 believe so. 13 That report was not necessarily 14 designated for the purpose of our SOMS, but 15 augments it in a way that is potentially helpful 16 at store level and in the distribution center. 17 It's more of a report to create operational 18 efficiencies in a way that we order all 19 products. 20 Q. What it sounds to me like is it's 21 more of an inventory management report, correct? 22 A. Yes. 23 Q. And the -- DDM's pharmacies, this 24 was a way to ensure that there was not too much</p>	<p style="text-align: right;">Page 65</p> <p>1 A. Inventory terms is -- is something 2 that we -- we measure, right. 3 Q. So I believe what I just heard you 4 testify was that -- that this report, this 5 six -- greater than six-week average report, the 6 specific purpose of that report was not to 7 fulfill DDM's role or responsibilities under 8 section 1301.74? 9 A. Correct. 10 MR. JOHNSON: Objection. 11 Q. All right. Let's continue with -- 12 with Ms. Strang. 13 She decides that there's a -- an 14 order that she wants to follow up with, correct? 15 A. (Witness nodding.) 16 Q. And -- 17 MR. JOHNSON: You have to answer 18 out loud. 19 Q. I'll keep going. I'll help too. 20 And it's -- in typical conversation we do a lot 21 of shaking head and saying "mm-hmm," and 22 unfortunately, in order for everybody to get 23 your testimony down, you have to say yes or no, 24 okay? I'll let you know --</p>